

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

IN THE MATTER OF THE SEARCH OF
INFORMATION ABOUT THE LOCATION
OF THE CELLULAR TELEPHONE ASSIGNED
CALL NUMBERS 414-426-0464 AND 512-940-1862
(THE "TARGET CELL PHONES"), WHOSE SERVICE
PROVIDER IS AT&T WIRELESS, AS FURTHER
DESCRIBED IN ATTACHMENT A

Case No. 22-M-543;
22-M-543 1st Ext.;
22-M-543 2nd Ext.; &
22-M-543 3rd Ext.

MOTION TO PUBLISH REDACTED AFFIDAVITS

NOW COMES the United States of America, by its attorneys Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Katherine M. Halopka-Ivery, Assistant United States Attorney for said district, and hereby moves the Court, pursuant to Rule 79(d) of the General Local Rules of the United States District Court for the Eastern District of Wisconsin, for an order sealing the unredacted affidavits in the above-named cases until further order of this Court, and to publish to the docket instead, a copy of the affidavits that contain the government's proposed narrow redactions. *See* Attachment A.

Beginning in July 2022, Drug Enforcement Agency (DEA), the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and the Waukesha Metro Drug Unit began investigating an ADTO operating in the Eastern District of Wisconsin involving among others Azjuan K. Meriwether, Dontrell Q. Franklin, Savanna J. Williams, Daniel Rodriguez-Perez, Brandon M. Nichols, Tasha M. Brown, Jaiden A. Henning, Jacob A. Flowers, Trennell Henning, Laron N. King, Shannone D. Brown and other identified and unidentified subjects. Through confidential sources, undercover controlled buys, physical surveillance, electronic surveillance, recorded jail calls and other investigative tools, case agents learned the ADTO sold fentanyl, purported to be

heroin, methamphetamines, cocaine, firearms, ghost guns (firearms without serial numbers making them untraceable), and Glock auto-sears devices (switches), which converts a semi-automatic firearm into a full-automatic firearm.

Since July 5, 2022, a confidential source (CS) and an undercover agent (UC) participated in numerous controlled buys with members of the ADTO. The affidavits in support of warrant corresponding to 22-M-543 and subsequent extensions contains information relating to a member of law enforcement working in an undercover capacity and a confidential source. The affidavit in support of the warrant also identifies other uncharged individuals that are still under investigation. On April 11, 2023, an indictment was filed against Azjuan K. Meriwether, Dontrell Q. Franklin, Savanna J. Williams, Daniel Rodriguez-Perez, Brandon M. Nichols, Tasha M. Brown, Jaiden A. Henning, Jacob A. Flowers, Trennell Henning, Laron N. King, Shannone D. Brown.

Since the indictment, threats against possible cooperators have been posted on social media. Additionally, while an indictment has been returned in relation to this investigation, the identity of and details relating to undercover agents and the confidential source is subject to a protective order. *See United States v. Azjuan K. Meriwether et al*, 23-CR-69, Docket No 19 (E.D. Wis. April 19, 2023). The protective order was requested and granted by Magistrate Judge Nancy Joseph to protective the identity of the undercover agents. Specifically, the order prohibits any discovery materials from being included in or attached to any public filing with the court that relates to the undercover agent. *Azjuan K. Meriwether et al*, 23-CR-69, Docket No 19 at 2.

Redactions in this affidavit are necessary to safeguard the identities of and details relating to the undercover agents, confidential source, and uncharged individuals still under investigation and to ensure the uncompromised prosecution of the defendants' violations. Public disclosure of their identity and identifying information at this time could jeopardize the safety of these

individuals and prejudice the government's prosecution of this matter, in that it could subject certain individuals to undue influence, harassment, intimidation, threats, and/or harm, or it could jeopardize ongoing investigations involving said agents. Further notification of the existence of the investigative regarding uncharged individuals in this matter will seriously jeopardize the continual investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, or notify confederates. To this end, the United States has redacted the affidavit in support of the warrant corresponding to 22-M-543 and subsequent extensions in the manner described above.

To balance the public's right to the information contained in the affidavit with the government's interest in safeguarding identities of unindicted individuals, the undercover agents, and the confidential source and protecting the investigation, the United States proposes to substitute the affidavits with ones that contain narrowly tailored redactions. *See* Attachment A. The redactions are generally limited to concealing those facts that directly identify the undercover agents, the confidential source, and uncharged individuals. Said redactions do not affect the public's ability to understand the affidavits.

Based on the foregoing, the United States respectfully requests that the Court seal the original, unredacted affidavits, and instead allow publication to the docket, the affidavit that contains the United States' proposed narrowly tailored redactions. *See* Attachment A.

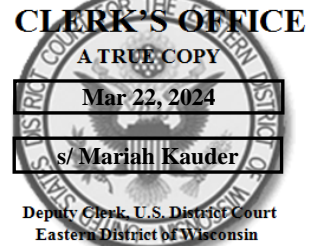
Respectfully submitted this 22nd day of March 2024, at Milwaukee, Wisconsin.

Respectfully submitted,

GREGORY J. HAANSTAD
United States Attorney

By: s/ Katherine M. Halopka-Ivery
KATHERINE M. HALOPKA-IVERY
Assistant United States Attorney

Office of the United States Attorney
Eastern District of Wisconsin
517 East Wisconsin Avenue, Rm 530
Milwaukee, Wisconsin 53202



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ORDER TO PUBLISH REDACTED AFFIDAVITS

Upon the motion of the United States Attorney for the Eastern District of Wisconsin, and
good cause appearing therefore,

IT IS HEREBY ORDERED, pursuant to Rule 79(d) of the General Local Rules of the
United States District Court of the Eastern District of Wisconsin, that that the affidavits supporting
the search warrants issued in the above-captioned cases be sealed until further order of this Court
and the redacted affidavits be published to the docket in its place.

Dated at Milwaukee, Wisconsin this 22nd day of March, 2024.

HONORABLE STEPHEN C. DRIES
United States Magistrate Judge